

In re:
Lisa Nguyen
Debtor

Case No. 18-16367-elf
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0313-2

User: John
Form ID: pdf900

Page 1 of 2
Total Noticed: 20

Date Rcvd: May 13, 2019

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on May 15, 2019.

db +Lisa Nguyen, 238 Keswick Avenue, Glenside, PA 19038-4836
cr +Abington School District and Township of Abington, c/o Portnoff Law Associates, Ltd.,
P.O. Box 3020, Norristown, PA 19404-3020
cr +Kim Beidler, c/o Bielli & Klauder, LLC, 1500 Walnut Street, Suite 900,
Philadelphia, PA 19102-3518
cr +Lynn Brinker, c/o Bielli & Klauder, LLC, 1500 Walnut Street, Suite 900,
Philadelphia, PA 19102-3518
cr +Mark Knouse, c/o Bielli & Klauder, LLC, 1500 Walnut Street, Suite 900,
Philadelphia, PA 19102-3518
cr +Montgomery County Tax Claim Bureau, c/o Michael D. Vagnoni, Esquire,
Centre Square West, Suite 3400, 1500 Market Street, Philadelphia, PA 19102-2100
cr +Toyota Motor Credit Corporation, c/o REBECCA ANN SOLARZ, 701 Market Street, Suite 5000,
Philadelphia, PA 19106-1541
14244900 +Kim Beidler, c/o Kristen Wetzel Ladd, Esq., 17 W Gay Street, PO Box 515,
West Chester, PA 19381-0515
14244897 +Kim Beidler, c/o Thomas D. Bielli, Esquire, & Cory P. Stephenson, Esquire,
1500 Walnut Street, Suite 900, Philadelphia, PA 19102-3518
14268944 +Knouse, Beidler & Brinker, 3634 Sturbridge Place, Allentown PA 18104-1770
14208411 +Knouse, Beidler & Brinker, c/o Kristen Wetzel Ladd, 17 W. Gay Street,
West Chester, PA 19380-3090
14244899 +Lynn Brinker, c/o Kristen Wetzel Ladd, Esq., 17 W Gay Street, PO Box 515,
West Chester, PA 19381-0515
14244896 +Lynn Brinker, c/o Thomas D. Bielli, Esquire, & Cory P. Stephenson, Esquire,
1500 Walnut Street, Suite 900, Philadelphia, PA 19102-3518
14244898 +Mark Knouse, c/o Kristen Wetzel Ladd, Esq., 17 W Gay Street, PO Box 515,
West Chester, PA 19381-0515
14244895 +Mark Knouse, c/o Thomas D. Bielli, Esquire, & Cory P. Stephenson, Esquire,
1500 Walnut Street, Suite 900, Philadelphia, PA 19102-3518

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
smg E-mail/Text: megan.harper@phila.gov May 14 2019 02:15:52 City of Philadelphia,
City of Philadelphia Law Dept., Tax Unit/Bankruptcy Dept, 1515 Arch Street 15th Floor,
Philadelphia, PA 19102-1595
smg E-mail/Text: RVSVCBICNOTICE1@state.pa.us May 14 2019 02:15:43
Pennsylvania Department of Revenue, Bankruptcy Division, P.O. Box 280946,
Harrisburg, PA 17128-0946
smg +E-mail/Text: usapae.bankruptcynotices@usdoj.gov May 14 2019 02:15:48 U.S. Attorney Office,
c/o Virginia Powel, Esq., Room 1250, 615 Chestnut Street, Philadelphia, PA 19106-4404
cr +E-mail/PDF: acg.acg.ebn@americaninfosource.com May 14 2019 02:28:36
Capital One Auto Finance, a division of Capital On, 4515 N Santa Fe Ave. Dept. APS,
Oklahoma City, OK 73118-7901
cr +E-mail/PDF: gecsed@recoverycorp.com May 14 2019 02:28:36 Synchrony Bank,
c/o PRA Receivables Management, LLC, PO Box 41021, Norfolk, VA 23541-1021
TOTAL: 5

***** BYPASSED RECIPIENTS *****

NONE.

TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: May 15, 2019

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

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Page 2 of 2
Total Noticed: 20

Date Rcvd: May 13, 2019

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on May 13, 2019 at the address(es) listed below:

CORY P. STEPHENSON on behalf of Creditor Kim Beidler cstephenson@bk-legal.com
CORY P. STEPHENSON on behalf of Creditor Mark Knouse cstephenson@bk-legal.com
CORY P. STEPHENSON on behalf of Creditor Lynn Brinker cstephenson@bk-legal.com
GERALD R CLARKE on behalf of Debtor Lisa Nguyen jclarke@clarkeandassoc.com,
clarkeandassoc@yahoo.com
JAMES RANDOLPH WOOD on behalf of Creditor Abington School District and Township of Abington
jwood@portnoffonline.com, jwood@ecf.inforuptcy.com
KRISTEN WETZEL LADD on behalf of Creditor Mark Knouse kladd@utbf.com
KRISTEN WETZEL LADD on behalf of Creditor Lynn Brinker kladd@utbf.com
KRISTEN WETZEL LADD on behalf of Creditor Kim Beidler kladd@utbf.com
MICHAEL D. VAGNONI on behalf of Creditor Montgomery County Tax Claim Bureau
michael.vagnoni@obermayer.com,
Lucille.acello@obermayer.com;Alicia.sandoval@obermayer.com;vanja.moraca@obermayer.com;angela.bagl
anzis@obermayer.com;helen.belair@obermayer.com
REBECCA ANN SOLARZ on behalf of Creditor Toyota Motor Credit Corporation
bkgroup@kmlawgroup.com
THOMAS DANIEL BIELLI on behalf of Creditor Kim Beidler tbielli@bk-legal.com,
cstephenson@bk-legal.com;acarrillo@bk-legal.com
THOMAS DANIEL BIELLI on behalf of Creditor Lynn Brinker tbielli@bk-legal.com,
cstephenson@bk-legal.com;acarrillo@bk-legal.com
THOMAS DANIEL BIELLI on behalf of Creditor Mark Knouse tbielli@bk-legal.com,
cstephenson@bk-legal.com;acarrillo@bk-legal.com
United States Trustee USTPRegion03.PH.ECF@usdoj.gov
WILLIAM C. MILLER, Esq. ecfemails@phl3trustee.com, philaecf@gmail.com

TOTAL: 15

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

LISA NGUYEN,

Debtor.

Chapter 13

Case No. 18-16367 (ELF)

CONSENT ORDER

Upon consideration of *Mark Knouse, Lynn Brinker, and Kim Beidler's Motion for In Rem Relief From the Automatic Stay Under §§ 105 and 362, Nunc Pro Tunc to October 29, 2018* (the "Motion")¹, and with the consent of Lisa Nguyen (the "Debtor") and Mark Knouse, Lynn Brinker, and Kim Beidler (collectively, the "Movants" and, together with the Debtor, the "Parties"), the Court hereby orders as follows:

1. The Motion is GRANTED as set forth herein.
2. The automatic stay of 11 U.S.C. § 362 is vacated as to the Debtor's interest in the real property located at 238 Keswick Avenue, Glenside, PA 19038 (the "Property") in order to allow the Movants, or their successors, to proceed with their rights relating to the Property, subject to the terms set forth herein.
3. Any future bankruptcy cases filed by the Debtor or her successors, assigns, and/or co-occupants of the Property shall not operate as a stay as to Movants' enforcement of their rights in and to the Property.
4. The relief from the automatic stay granted pursuant to this Order shall be deemed retroactively effective to October 29, 2018.
5. The Movants will not proceed with any action to enforce their rights relating to the Property while the Debtor is in compliance with the terms of this Order, the note (the

¹ Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion.

“Note”), which is attached to the Movants’ proof of claim as Exhibit A, and the mortgage (the “Mortgage”), which is attached to the Movants’ proof of claim as Exhibit B.

6. The Debtor shall remain current on the monthly payments of interest and principal due pursuant to the Note.

7. The Debtor shall provide proof of homeowner’s insurance and business liability insurance for the Property on or before April 30, 2019, and within fourteen (14) days after the expiration or termination of the existing homeowner’s insurance and business liability policies and any subsequent policies that replace those existing policies.

8. In accordance with the Mortgage, the Debtor shall make monthly payments, on or before the 1st of each month, to the Movants in the amount of 1/12 of the estimated annual real estate taxes for the Property, which the Movants shall place into an escrow account and pay to the appropriate taxing authority upon the Debtor providing documentation of the property taxes due to the Movants.

9. Upon receiving notice from the Movants of the tax escrow balance being insufficient to pay the full amount of the annual real estate taxes due for the Property, the Debtor shall make any supplemental payment required directly to the relevant taxing authority and provide documentation of such payment on or before the date that the annual real estate tax payment for the Property is due.

10. Any real estate taxes relating to the Property that are currently owed, past due, or otherwise claim by any taxing authority must be either paid by the Debtor within fourteen (14) days of the entry of this Consent Order or paid through the Debtor's above-captioned bankruptcy proceeding.

11. In addition to the payments required pursuant to the Note, the Mortgage, and elsewhere in this agreement, the Debtor shall make a total of forty-two (42) payments (the "Additional Payments") of \$660.57 to the Movants in order to repay the real estate taxes paid relating to the Property by the Movants and to compensate the Movants for legal fees incurred in attempting to secure payment from the Debtor. The first of the Additional Payments shall be made on June 1, 2019, with the remaining Additional Payments continuing on the 1st of each subsequent month.

12. Any failure to comply with the terms of this Order shall not be considered a default until the expiration, without cure, of four (4) days following notice of the failure to comply with this Order being provided by the Movants to the Debtor through email correspondence to the Debtor's attorney at jclarke@clarkeandassoc.com. The Debtor shall only have the right to cure a default three (3) times within a calendar year.

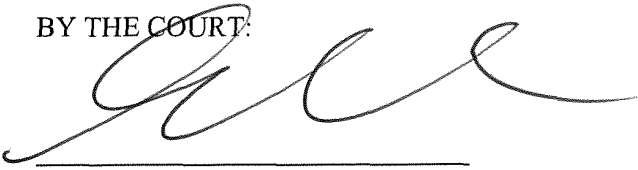
13. Any notification of default sent to jclarke@clarkeandassoc.com is deemed valid and received upon sending. If the default is not cured within four (4) days from the date of sending of notice, Movants may immediately proceed with enforcement of their rights and remedies under the loan documents, including, without limitation, a sheriff sale of the Property. The 14-day stay period under Rule 4001(a)(3) is waived, and this order shall become effective immediately upon its entry.

~~14. The Court shall retain jurisdiction over any matter arising from or related to this~~

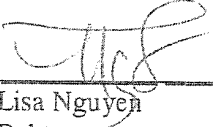
~~order~~

BY THE COURT:

Dated: May 10, 2019


Honorable Eric L. Frank
United States Bankruptcy Judge

The undersigned hereby consent to the form and entry of the within order.

By: 

Lisa Nguyen
Debtor

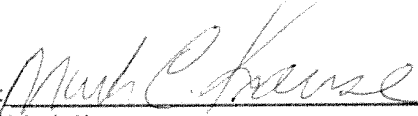
By: _____
Mark Knouse
Movant

By: _____
Lynn Brinker
Movant

By: _____
Kim Beidler
Movant

The undersigned hereby consent to the form and entry of the within order.

By: _____
Lisa Nguyen
Debtor

By:  _____
Mark Knouse
Movant

By: _____
Lynn Brinker
Movant

By: _____
Kim Beidler
Movant

The undersigned hereby consent to the form and entry of the within order.

By: _____
Lisa Nguyen
Debtor

By: _____
Mark Knouse
Movant

By: _____
Lynn Brinker
Movant

By: Kim Beidler
Kim Beidler
Movant

The undersigned hereby consent to the form and entry of the within order.

By: _____
Lisa Nguyen
Debtor

By: _____
Mark Knouse
Movant

By: Lynn Brinker
Lynn Brinker
Movant

By: _____
Kim Beidler
Movant